

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

LOUISE T. COOLEY
Plaintiff

v.

PAUL E. RIPPEON, et al.
Defendants

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Case No. 1991 E

OPPOSITION TO PLAINTIFF'S MOTION
FOR INTERLOCUTORY INJUNCTION

Defendant, Paul E. Rippeon, by his attorneys, Shaffer and Davis, Chartered hereby opposes Plaintiff's Motion for Interlocutory Injunction seeking an order enjoining him and his lessees and assigns from all acts interfering with Plaintiff's possession of the property which is the subject of this case pending a resolution of the merits, and for reasons states as follows:

1. Defendant, Paul E. Rippeon, is the owner of the improved property located at 315 West Second Street, Frederick, Maryland 21701 including the property in dispute (the "Disputed Area") having taken title thereto by deed dated September 16, 1985 and recorded in Book 1299 Page 686 among the Land Records of Frederick County, Maryland.

2. The Disputed Area consists of a rectangular parcel measuring 50 feet by 9 feet, containing 450 square feet of area, more or less, and adjoins property used as a parking lot for the residents and tenants of the apartment building owned by the Plaintiff located at 202 College Avenue, Frederick, Maryland.

3. Upon information and belief, Plaintiff's apartment building contains four (4) separate units all of which are currently leased.